

Exhibit A

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

SIMONE CLARKE,

Plaintiff,

-against-

NEW YORK CITY
BOARD/DEPARTMENT OF
EDUCATION; CLAUDETTE
CHRISTIE, PRINCIPAL OF WATCH
HIGH SCHOOL,

Defendants.

**PLAINTIFF'S FRCP RULE 26(A)(1)
INITIAL DISCLOSURES**

ECF CASE

18 CV 1850 (NGG)(JO)

Plaintiff SIMONE CLARKE, as and for her Initial Disclosures to the Defendants, sets forth the following:

A) Potential witnesses: In addition to the named Plaintiff and individual Defendant in this action, the following individuals are likely to have discoverable information concerning Plaintiff's terms and conditions of employment with Defendants, which Plaintiff may use to support her claims.

1. Claudette Christie, principal, WATCH High School

This witness would have knowledge of discrimination and retaliation allegations at WATCH High School in Brooklyn, New York.

2. Elizabeth Ramos, paraprofessional, WATCH High School

This witness would have knowledge of Defendant Christie's discriminatory treatment of Plaintiff.

3. Ms. Dobson, paraprofessional, WATCH High School

This witness would have knowledge of Defendant Christie's discriminatory treatment of Plaintiff.

4. David Rivera, assistant principal, WATCH High School

This witness would have knowledge of Defendant Christie's discriminatory treatment of Plaintiff.

5. Patrice White, parent coordinator, WATCH High School

This witness would have knowledge of Defendant Christie's discriminatory treatment of Plaintiff.

6. Nicole Henry, school aide, WATCH High School

This witness would have knowledge of Defendant Christie's discriminatory treatment of Plaintiff.

7. Ms. Chantel? Jackson, guidance counselor, WATCH High School

This witness would have knowledge of Defendant Christie's discriminatory treatment of Plaintiff.

8. Gregory Blackman, teacher, WATCH High School

This witness would have knowledge of Defendant Christie's discriminatory treatment of Plaintiff.

9. Ms. DeJoie, guidance counselor, WATCH High School

This witness would have knowledge of Defendant Christie's discriminatory treatment of Plaintiff.

10. Sheldon Johnson, attendance teacher, WATCH High School

This witness would have knowledge of Defendant Christie's discriminatory treatment of Plaintiff.

Plaintiff reserves the right to call any witnesses identified by Defendants as a potential witness, with respect to relevant matters herein, and to supplement this list as necessary.

B) Documents (FRCP 26(a)(1)(B)): Plaintiff identifies the following categories of documents that are in her possession, custody, and control, that she may use to support her claims.

1. Documents from her personnel file
2. New York City Commission on Human Rights file
3. Emails, text messages, and audiotapes regarding discriminatory treatment of Plaintiff

C) Damages alleged (FRCP 26(a)(1)(c))

1. The following are preliminary computations as to compensatory and punitive damages: the maximum allowable under Title VII and state and city laws, including, but not limited to, lost salary and health and retirement benefits; financial losses related to school and education loans; lost per session and summer school opportunities; attorneys' fees, damages to reputation and livelihood as an Assistant Principal; and emotional distress and the physical medical symptoms related to those damages.

D) Insurance agreements which may satisfy part of judgment (FRCP 26(a)(1)(d))

None aware of by Plaintiff.

Plaintiff reserves the right to supplement and/or amend these disclosures as discovery progresses and additional information becomes available to the parties.

Dated: New York, New York
July 12, 2018

Respectfully submitted,

GLASS KRAKOWER LLP

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